UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
IN RE LONE PINE RESOURCES, INC.	X : : : : : : : : : : : : : : : : :	No. 12-cv-4839-GBD ECF Case

## NOTICE OF MOTION TO DISMISS THE CONSOLIDATED AMENDED COMPLAINT

PLEASE TAKE NOTICE that upon the annexed declaration of Steven R. Paradise, dated March 22, 2013, and the exhibits attached thereto, the Memorandum of Law in Support of Motion to Dismiss the Consolidated Amended Complaint, and the pleadings herein, Defendants Lone Pine Resources Inc., Forest Oil Corporation, David M. Anderson, Michael N. Kennedy, H. Craig Clark, Patrick R. McDonald, David M. Fitzpatrick, Loyola G. Keough, and H. Clayton Peterson (collectively, the "Defendants"), by their attorneys, Vinson & Elkins L.L.P., will move this Court, before the Honorable George Daniels, United States District Judge, United States District Court, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 11A, on August 1, 2013 at 10:00 a.m., or as soon thereafter as counsel can be heard for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Consolidated Amended Complaint against the Defendants, with prejudice, for Plaintiffs' failure to state a claim upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Stipulation so Ordered on January 25, 2013, any opposing memoranda must be served on or before May 24, 2013, and any reply memoranda must be served on or before June 25, 2013.

Dated: March 22, 2013

Respectfully submitted,

## VINSON & ELKINS L.L.P.

By: <u>/s/ Steven R. Paradise</u>

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